

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Lori Saroya,

Court File No. 24-CV-110 (DWF/DTS)

Plaintiff,

v.

CAIR Foundation, Inc. d/b/a
Council on American-Islamic Relations &
CAIR,

**DECLARATION OF
ROULA ALLOUCH**

Defendant.

Pursuant to 28 U.S.C. § 1746, Roula Allouch declares, as follows:

1. My name is Roula Allouch. I have personal knowledge of the facts stated in this declaration.
2. I am the Co-Chair Emeritus of CAIR Foundation, Inc. ("CAIR"). I have held this role since January 2023. Before this time, I was CAIR's National Board Chair. All of my roles with CAIR have been in a volunteer capacity.
3. I have resided in Ohio for approximately five years, before which I resided in Kentucky. I have never resided in Minnesota.
4. I have not traveled to Minnesota since at least 2017.
5. I do not own any property in Minnesota.
6. In my role at CAIR, my work is not, and has never been, focused specifically on Minnesota.


7. The entirety of my involvement with respect to CAIR's 2022 statement, which Plaintiff Lori Saroya has referred to as a "press release" and which is attached as Exhibit 4 to her proposed Amended Complaint (the "Community Update"), was in my professional role at CAIR.

8. Specifically, to the extent I was at all involved in drafting, revising, approving, sharing, or otherwise disseminating the Community Update, I did so solely on behalf of CAIR. I did not do so on my own behalf and did not do so in my personal or individual capacity.

9. I had no intent that the Community Update be shared with any person or entity in Minnesota. It was posted on CAIR's website, was generally available to people who chose to view CAIR's website, and was not specifically targeted to Minnesota or Minnesota residents.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: December 19, 2024

By:  _____

Executed in: Hamilton County, Ohio

Roula Allouch